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February 6, 2024

VIA ECF

The Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: Ricardo Jiminez v. City of New York, et. al., 23 Civ. 6751 (NRB)


Your Honor:

I am a Senior Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants City of New York, Bronx County DA's Office, Wendell Stradford, Christopher Horn and Karen Serrano-Paglia, "as Administrator of the Estate of Michael Serrano" in the above-referenced matter. At Docket 35, on January 22, 2024, plaintiff filed a second amended complaint, and substituted Karen Serrano-Paglia, "as Administrator of the Estate of Michael Serrano" for the deceased Michael Serrano. Earlier, today, at Docket 42, I appeared as counsel of record for Karen Serrano-Paglia, "as Administrator of the Estate of Michael Serrano." We previously filed notices of appearance on behalf of the other defendants. In the interest of judicial economy, we propose to file one combined motion to dismiss on behalf of all defendants. Counsel have conferred and, on consent, propose the following amended briefing schedule: 1) defendants' motion to dismiss-March 1, 2024; 2) plaintiff's response-April 6, 2024; and 3) defendants' reply-April 20, 2024.

This is the first such request for an extension of the briefing schedule on defendants' motion to dismiss.

Application granted.

So ordered.


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: February 7, 2024
New York, New York

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman

Mark D. Zuckerman
Senior Counsel

cc: All Counsel (via ECF)